

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

X CORP.,	§	
Plaintiff,	§	
v.	§	
WORLD FEDERATION OF	§	Case No. 7:24-cv-00114-B
ADVERTISERS; MARS, INCORPORATED;	§	
CVS HEALTH CORPORATION; ØRSTED	§	
A/S; TWITCH INTERACTIVE, INC.;	§	
NESTLÉ S.A.; NESTLE USA, INC.;	§	
ABBOTT LABORATORIES; COLGATE	§	
PALMOLIVE COMPANY; LEGO A/S;	§	
LEGO BRANDS RETAIL, INC.;	§	
PINTEREST, INC; TYSON FOODS, INC.;	§	
SHELL PLC; SHELL USA, INC.; and	§	
SHELL BRANDS INTERNATIONAL AG,	§	
Defendants.	§	

**SHELL PLC'S MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION AND IMPROPER VENUE**

For the reasons explained in its simultaneously filed Brief, Defendant Shell plc respectfully asks the Court to dismiss Shell plc for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2) and for improper venue under Federal Rule of Civil Procedure 12(b)(3).

Subject to and without waiver of its Motion to Dismiss under Rule 12(b)(2) and Rule 12(b)(3), Shell plc also adopts and incorporates by reference the arguments set forth in Defendants' Motion to Dismiss for Failure to State a Claim, and accompanying, Brief in Support of Motion to Dismiss for Failure to State a Claim.

Dated: May 14, 2025

Respectfully submitted,

By: /s/ Layne E. Kruse
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Attorneys for Defendant Shell plc

CERTIFICATE OF SERVICE

I certify that on May 14, 2025, a true and correct copy of the foregoing instrument was served on all counsel of record using the Court's electronic filing system.

Dated: May 14, 2025

Respectfully submitted,

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